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Attorney for Defendants  
EVGENII RUSSU and  
DELYANA NEDYALKOVA

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 vs.  
12 EVGENII RUSSU and  
13 DELYANA NEDYALKOVA,  
Defendants.

Case No. 2:11-cr-00434-LDG-PAL

**15 JOINDER TO DEFENDANTS EVGENII RUSSU AND DELYANA NEDYALKOVA  
MOTION TO CONTINUE TRIAL**

17 Defendants EVGENII RUSSU and DELYANA NEDYALKOVA, by and thru their  
18 attorney, HERBERT SACHS, ESQ., hereby joints in Co-Defendant Michael Vale's MOTION  
19 TO CONTINUE TRIAL in the above entitled matter.

21 | DATED this 14<sup>th</sup> day of December, 2012.

/s/ Herbert Sachs  
**HERBERT SACHS, ESQ.**  
Nevada Bar No. 2785  
602 South Tenth Street  
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Attorney for Defendants  
EVGENII RUSSU and  
DELYANA NEDYALKOVA

## **SUPPLEMENTAL POINTS AND AUTHORITIES**

Defendants EVGENII RUSSU AND DELYANA NEDYALKOVA hereby adopt the points and authorities submitted by Defendant Michael Vales, and submits the following to supplement that argument.

5           1. A Motion to Withdraw from representation of Defendant EVGENII RUSSU is  
6 presently pending before this Court. Keeping the above in mind and until the motion is either  
7 granted or denied, the undersigned attorney makes this motion on behalf of both EVGENII  
8 RUSSU AND DELYANA NEDYALKOVA.

9       2. The undersigned is a busy practitioner with many cases pending in both the Nevada  
10 State Courts and this Court. Counsel has not completed review of Discovery submitted to him by  
11 the United States Attorney Office.

12        3. Discovery in this case consists of at least 8 CD's. According to Bates Stamps there are  
13 over 20,000 pages of Discovery some of which are in a foreign language and must be translated.  
14 Based on CA guidelines, if 1 minute per page for discovery review, the amount of discovery in  
15 this case would amount to over 330 hours, which translates into over two months of 40 hour  
16 weeks.

17       4. EVGENII RUSSU is presently in custody and resides at the federal prison located in  
18 Pahrump, Nevada. DELYANA NEDYALKOVA is presently free on bail and does not object to  
19 the continuance and waives any speedy trial requirement.

21 | DATED this 14<sup>th</sup> day of December, 2012.

/s/ Herbert Sachs  
HERBERT SACHS, ESQ.  
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602 South Tenth Street  
Las Vegas, NV 89101  
(702) 387-0400  
Attorney for Defendants  
EVGENII RUSSU and  
DELYANA NEDYALKOVA

ORDER

IT IS SO ORDERED.

DATED this 10 day of December, 2012.

Lloyd D. George  
U.S. District Judge